

REMARKS/ARGUMENTS

This Amendment is being filed in response to the Office Action of May 28, 2010. Reconsideration and allowance of the application in view of the amendments made above and the remarks to follow are respectfully requested.

Claims 1-20 are pending in the Application. Claims 1, 7 and 12 are independent claims. By means of the present amendment, the claims are amended including for better conformance to U.S. practice, such as correcting informalities noted upon review of the claims. By these amendments, the claims are not amended to address issues of patentability and Applicant respectfully reserves all rights under the Doctrine of Equivalents. Applicant furthermore reserves the right to reintroduce subject matter deleted herein at a later time during the prosecution of this application or continuing applications.

In the Final Office Action, claims 1-3, 6, 12-14 and 18-20 are rejected under 35 U.S.C. §103(a) over U.S. Patent Publication No. 2003/0009537 to Wang ("Wang") in view of U.S. Patent No. 6,281,790 to Kimmel ("Kimmel"). Claims 4, 5, 7-11 and 15-17 are rejected under 35 U.S.C. §103(a) over Wang in view of Kimmel and further in view of U.S. Patent No. 6,182,116 to Namma ("Namma"). The rejection of claims 1-20 is respectfully traversed. It is respectfully submitted that claims 1-20 are allowable over Wang, Kimmel, and Namma for at least the following reasons.

Claim 1 recites in substantial form a system in which a web browser controls a plurality of controllable devices through a web server embedded in one of the devices. The device including the embedded server is termed in the claims "a master control device". In

accordance with the claims, the master device is one of the plurality of devices, however, the master control device includes the embedded web server.

Wang describes a network of devices in which one of the devices DTV 102, the one that includes video capabilities and a browser, is selected to display user interface pages included in all the devices (see, Wang, paragraphs [0085]-[0086]). Wang further recites an ability to remotely utilize such devices including video capabilities and a browser, now referenced as TV 1058 (see, Wang, paragraphs [0273]-[0275]). However, an addition of another layer of communications for connecting a remote PC to the device operating a web browser does not remedy the deficiencies in Wang. Even if, in arguendo, this device of Wang is interpreted as "a device for operating a web browser" as recited in claim 1, a position which is refuted, Wang alone and in combination with the other cited prior art still does not teach, disclose or suggest the master control device of the claims. In Wang, "a device for operating a web browser" and "said master control device" are the same device, namely DTV 102/TV 1058 or equivalent. Thus Wang does not teach, disclose, or suggest "a device for operating a web browser for communicating with said embedded web server on said master control device in order to access said linked devices" as recited in claim 1.

Moreover, it cannot be said about the DTV 102/TV 1058 or their equivalent of Wang that "said web browser controls each of said linked devices indirectly through said embedded web server on said master control device" as recited in claim 1.

Namma describes a virtual server apparatus 91 that is a separate unique device distinct from the servers 92 and 93. The server apparatus 91 of Namma cannot perform the functions of the servers 92 and 93, such as filming or playing back video and

transferring video data, and vice versa. The virtual server apparatus 91 of Namma does not produce image data without receiving it from one of the serves 92, 93. Namma, does not teach, disclose, or suggest "a master control device selected from the plurality of devices the master control device comprising an embedded web server, each of the plurality of devices [including the master control device since it is selected from the plurality of devices] including a peer interface module and host software" as recited in claim 1.

Kimmel is not cited regarding this feature of the claims and in any event does nothing to cure the deficiencies in Wang and Namma.

It is respectfully submitted that the system of claim 1 is not anticipated or made obvious by the teachings of Wang in view of Kimmel. For example, Wang in view of Kimmel does not teach, disclose or suggest, a system that amongst other patentable elements, comprises (illustrative emphasis added) "a master control device selected from the plurality of devices, the master control device comprising an embedded web server, each of the plurality of devices including a peer interface module and host software; one or more linked devices selected from the plurality of devices, the one or more linked devices are controlled by said embedded web server of said master control device, the peer interface module of said linked devices communicates in a peer to peer manner with the peer interface module of said master control device for being controlled by said embedded web server; and a device for operating a web browser for communicating with said embedded web server on said master control device in order to access said linked devices, wherein said web browser controls each of said linked devices indirectly through said embedded web server on said master control device and receives data directly from each

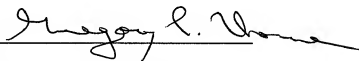
of said plurality of devices that have been selected to provide the data" as recited in claim 1, and as similarly recited in each of claims 7 and 12.

Based on the foregoing, the Applicant respectfully submits that independent claims 1, 7 and 12 are patentable and notice to this effect is earnestly solicited. Claims 2-6, 8-11, and 13-20 respectively depend from one of claims 1, 7 and 12 and accordingly are allowable for at least this reason as well as for the separately patentable elements contained in each of the claims. Accordingly, separate consideration of each of the dependent claims is respectfully requested.

In addition, Applicant denies any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicant reserves the right to submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.

Applicant has made a diligent and sincere effort to place this application in condition for immediate allowance and notice to this effect is earnestly solicited.

Respectfully submitted,

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